

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 19-CR-02

vs.

ALEXANDER P. BEBRIS,

Defendant.

MOTION TO ADJOURN

TO: Daniel R. Humble, Assistant United States Attorney
United States Attorney's Office
205 Doty Street, Suite 301
Green Bay, Wisconsin 54301

Defendant Alexander P. Bebris, by his attorneys Jason D. Luczak and GRGB Law, respectfully moves the court, the Honorable William C. Griesbach, presiding, for an adjournment of the plea hearing for the above-captioned matter, which is currently scheduled for August 3, 2020.

AS GROUNDS Bebris asserts:

1. After consultation with the parties, this Court rescheduled the plea hearing in the above-captioned matter for August 3, 2020.
2. Counsel for Bebris inadvertently doubled booked August 3, 2020 and has a previously scheduled *Daubert* hearing on that same date in Waukesha County which involves two witnesses, one of which is out-of-state.

3. Given the previously scheduled *Daubert* hearing, it would be impossible for Bebris's counsel of choice to be present for his plea hearing.

4. The undersigned has spoken with Assistant United States Attorney Dan Humble, who does not object to the defense's request for a brief adjournment.

5. For the above-stated reasons, Bebris respectfully request that the Court adjourn the scheduled plea hearing for a time in August convenient to all parties.

Dated this 26th day of June, 2020.

Respectfully submitted,

GRGB Law

By:

/s/Jason D. Luczak

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